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ACCEPTED FOR PROCESSING - 2020 August 17 1:21 PM - SCPSC - 2019-290-WS - Page 1 of 6



**ROBINSON  
GRAY**

Litigation + Business

**SAMUEL J. WELLBORN**

DIRECT 803 231.7829 DIRECT FAX 803 231.7878

swellborn@robinsongray.com

August 17, 2020

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk / Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

Re: Application of Blue Granite Water Company for Approval to Adjust Its  
Rate Schedules and Increase Rates  
Docket No. 2019-290-WS

Dear Ms. Boyd:

Please find attached for filing the surety bond in the amount of \$                       
issued by Liberty Mutual Insurance Company which was procured pursuant to  
S.C. Code Ann. § 58-5-240(D). An original of the bond forms are being sent to  
the Commission for its records. A copy of this filing is being provided to the  
parties of record.

Kind regards,

Sam Wellborn

SJW:tch

Enclosure

cc w/enc: Parties of Record (via email)  
Donald H. Denton, President (via email)  
Dante Destefano, Financial Planning & Analysis Manager (via email)

Exhibit No. 2

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
Docket No. 2019-290-WS

In Re:

Application of Blue Granite Water  
Company for Approval to Adjust Rate  
Schedules and Increase Rates

BOND NO. \_\_\_\_\_

KNOW ALL PEOPLE BY THESE PRESENTS, that Blue Granite Water Company, as Principal, and Liberty Mutual Insurance Company Surety Company, a corporation under the laws of the State of Massachusetts duly authorized to transact business in the State of South Carolina as surety, are held and firmly bound unto the customers of Blue Granite Water Company affected by Order No. 2020-306 of the Public Service Commission of South Carolina ("Commission"), dated April 9, 2020, and any Order denying reconsideration thereof (collectively, "Orders"), issued in the above-captioned proceeding, for the sum of \_\_\_\_\_ dollars \_\_\_\_\_ in lawful money of the United States of America, for payment of which, well and truly to be made, we bind ourselves, our heirs, executors, administrators, successors, and assigns, jointly and severally, firmly by these presents.

NOW, THEREFORE, THE CONDITION OF THIS OBLIGATION IS SUCH, that if the Commission Orders under appeal are ultimately determined to be valid and enforceable, then, Blue Granite Water Company hereby promises to refund amounts it has collected in excess of the amounts finally determined to be correct under the appropriate rate schedules. Any such refunds shall include interest as provided by law.

Exhibit No. 2

SIGNED, sealed and dated this 13th day of August, 2020.

**As to Principal**

Blue Granite Water Company

Jari Petersen  
Witness

Shawn M Eluegi

ATTEST:

Jane Harrell  
Witness

\_\_\_\_\_

**As to Surety**

Liberty Mutual Insurance Company

Adam Kneitz  
Witness Adam Kneitz

Laura L. Kneitz  
Laura L. Kneitz, Attorney-in-Fact

Erica Kneitz  
Witness Erica Kneitz

Exhibit No. 2

## WITNESS AS TO PRINCIPAL

STATE OF Nevada, Washoe County

Before me, the subscribing Notary Public, personally appeared Shawn EliceGUI  
and made oath that he/she saw the within named Blue Granite Water Company represented by  
sign, seal, and deliver the within Bond, and that he/she with Jane Harrell and  
Lori Petersen subscribed their names as witnesses thereto.

Sworn to and subscribed before me this 17 day of August, 2020.

Lynn D'Innocenti  
Notary Public

My commission expires: May 2, 2021

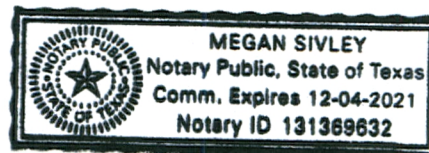
## WITNESS AS TO SURETY

STATE OF Texas, Harris County

Before me, the subscribing Notary Public, personally appeared Laura L. Kneitz  
and made oath that he/she saw the within named Liberty Mutual Insurance Company Surety Company  
represented by sign, seal, and deliver the within Bond, and that he/she with  
Adam Kneitz and Erica Kneitz subscribed their names as witnesses  
thereto.

Sworn to and subscribed before me this 13th day of August, 2020.

Megan Sivley  
Notary Public

My commission expires: December 4, 2021





This Power of Attorney limits the acts of those named herein, and they have no authority to bind the Company except in the manner and to the extent herein stated.

Liberty Mutual Insurance Company  
The Ohio Casualty Insurance Company  
West American Insurance Company

Certificate No: \_\_\_\_\_

## POWER OF ATTORNEY

**KNOWN ALL PERSONS BY THESE PRESENTS:** That The Ohio Casualty Insurance Company is a corporation duly organized under the laws of the State of New Hampshire, that Liberty Mutual Insurance Company is a corporation duly organized under the laws of the State of Massachusetts, and West American Insurance Company is a corporation duly organized under the laws of the State of Indiana (herein collectively called the "Companies"), pursuant to and by authority herein set forth, does hereby name, constitute and appoint, \_\_\_\_\_ Dan W. Burton, Melissa Haddick, Teresa D. Kelly, Laura L. Kneitz, Craig C. Payne, Megan Sivley

all of the city of Houston state of TX each individually if there be more than one named, its true and lawful attorney-in-fact to make, execute, seal, acknowledge and deliver, for and on its behalf as surety and as its act and deed, any and all undertakings, bonds, recognizances and other surety obligations, in pursuance of these presents and shall be as binding upon the Companies as if they have been duly signed by the president and attested by the secretary of the Companies in their own proper persons.

**IN WITNESS WHEREOF**, this Power of Attorney has been subscribed by an authorized officer or official of the Companies and the corporate seals of the Companies have been affixed thereto this 18th day of March, 2019.



Liberty Mutual Insurance Company  
The Ohio Casualty Insurance Company  
West American Insurance Company

By: \_\_\_\_\_

David M. Carey, Assistant Secretary

State of PENNSYLVANIA ss  
County of MONTGOMERY

On this 18th day of March, 2019 before me personally appeared David M. Carey, who acknowledged himself to be the Assistant Secretary of Liberty Mutual Insurance Company, The Ohio Casualty Company, and West American Insurance Company, and that he, as such, being authorized so to do, execute the foregoing instrument for the purposes therein contained by signing on behalf of the corporations by himself as a duly authorized officer.

**IN WITNESS WHEREOF**, I have hereunto subscribed my name and affixed my notarial seal at King of Prussia, Pennsylvania, on the day and year first above written.



COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Teresa Pastella, Notary Public  
Upper Merion Twp., Montgomery County  
My Commission Expires March 28, 2021  
Member, Pennsylvania Association of Notaries

By: \_\_\_\_\_

Teresa Pastella, Notary Public

This Power of Attorney is made and executed pursuant to and by authority of the following By-laws and Authorizations of The Ohio Casualty Insurance Company, Liberty Mutual Insurance Company, and West American Insurance Company which resolutions are now in full force and effect reading as follows:

### ARTICLE IV – OFFICERS: Section 12. Power of Attorney.

Any officer or other official of the Corporation authorized for that purpose in writing by the Chairman or the President, and subject to such limitation as the Chairman or the President may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Corporation to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact, subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Corporation by their signature and execution of any such instruments and to attach thereto the seal of the Corporation. When so executed, such instruments shall be as binding as if signed by the President and attested to by the Secretary. Any power or authority granted to any representative or attorney-in-fact under the provisions of this article may be revoked at any time by the Board, the Chairman, the President or by the officer or officers granting such power or authority.

### ARTICLE XIII – Section 5. Surety Bonds and Undertakings.

Any officer of the Company authorized for that purpose in writing by the chairman or the president, and subject to such limitations as the chairman or the president may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Company by their signature and execution of any such instruments and to attach thereto the seal of the Company. When so executed such instruments shall be as binding as if signed by the president and attested by the secretary.

**Certificate of Designation** – The President of the Company, acting pursuant to the Bylaws of the Company, authorizes David M. Carey, Assistant Secretary to appoint such attorneys-in-fact as may be necessary to act on behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations.

**Authorization** – By unanimous consent of the Company's Board of Directors, the Company consents that facsimile or mechanically reproduced signature of any assistant secretary of the Company, wherever appearing upon a certified copy of any power of attorney issued by the Company in connection with surety bonds, shall be valid and binding upon the Company with the same force and effect as though manually affixed.

I, Renee C. Llewellyn, the undersigned, Assistant Secretary, The Ohio Casualty Insurance Company, Liberty Mutual Insurance Company, and West American Insurance Company do hereby certify that the original power of attorney of which the foregoing is a full, true and correct copy of the Power of Attorney executed by said Companies, is in full force and effect and has not been revoked.

**IN TESTIMONY WHEREOF**, I have hereunto set my hand and affixed the seals of said Companies this 13th day of August, 2020



By: \_\_\_\_\_

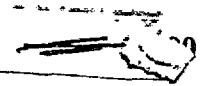
Renee C. Llewellyn, Assistant Secretary

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
Docket No. 2019-290-WS

IN RE:

Application of Blue Granite Water  
Company for Approval to Adjust Rate  
Schedules and Increase Rates

CERTIFICATE OF SERVICE

This is to certify that I, Toni C. Hawkins, a paralegal with the law firm of Robinson Gray Stepp & Laffitte, LLC have this day served a copy of the **Bond**  in the referenced matter to the parties listed below by electronic mail:

Andrew M. Bateman, Counsel  
Alexander W. Knowles, Counsel  
Christopher M. Huber, Counsel  
S. C. Office of Regulatory Staff  
[abateman@ors.sc.gov](mailto:abateman@ors.sc.gov)  
[aknowles@ors.sc.gov](mailto:aknowles@ors.sc.gov)  
[chuber@ors.sc.gov](mailto:chuber@ors.sc.gov)

Michael Kendree, County Attorney  
York County, South Carolina  
[Michael.kendree@yorkcountygov.com](mailto:Michael.kendree@yorkcountygov.com)

Richard L. Whitt, Counsel  
Whitt Law Firm, LLC  
[richard@rlwhitt.law](mailto:richard@rlwhitt.law)

Carri Grube Lybarker, Counsel  
SC Department of Consumer Affairs  
[clybarker@scconsumer.gov](mailto:clybarker@scconsumer.gov)

Roger P. Hall, Counsel  
SC Department of Consumer Affairs  
[rhall@scconsumer.gov](mailto:rhall@scconsumer.gov)

James S. Knowlton, Pro Se  
[jim.knowlton@sim.org](mailto:jim.knowlton@sim.org)

S. Jahue Moore, Counsel  
Moore Taylor Law Firm, PA  
[jake@mttlaw.com](mailto:jake@mttlaw.com)

Laura P. Valtorta, Counsel  
Valtorta Law Office  
[laurapv@aol.com](mailto:laurapv@aol.com)

Stefan Dover, Pro Se  
[stefandover@yahoo.com](mailto:stefandover@yahoo.com)

John J. Pringle, Jr., Counsel  
Adams and Reese, LLP  
[jack.pringle@arlaw.com](mailto:jack.pringle@arlaw.com)

Dated at Columbia, South Carolina, this 17<sup>th</sup> day of August, 2020.

